

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:10cr485 (LMB)
)	
JEFFREY ALEXANDER STERLING)	

RESPONSE OF THE UNITED STATES TO DEFENDANT’S PROPOSED VOIR DIRE

The United States submits the following responses to the defendant’s proposed *voir dire* (Dkt. No. 252):

1 – 3. No objection, to the extent that the Court will show a list of all potential witnesses to the panel.

4. No objection.

5. No objection.

6. Objection. This question as phrased is too vague. The question also lacks context. The potential for confusion by this question outweighs any attempt at identifying bias.

7. Objection. This area can be explored with a more general inquiry regarding employment in any intelligence agency or other organization. The government suggests a modification of its *voir dire* question five can satisfy this inquiry.

8. Objection. The question is irrelevant. Further, this question as phrased is too vague. The question lacks context. The potential for confusion by this question outweighs any attempt at identifying bias.

9. No objection.

10. Objection. The question as phrased is too vague. The question lacks context. The

potential for confusion by this question outweighs any attempt at identifying bias.

11. Objection. The question as phrased is too broad. The question lacks context. The potential for confusion by this question outweighs any attempt at identifying bias.

12. Objection. The question as phrased is too vague and too broad. The question lacks context. The potential for confusion by this question outweighs any attempt at identifying bias.

13. No objection.

14. No objection.

15. Objection. This question is repetitive and an appropriate response can be elicited with other questions.

16. Objection. This question is inflammatory and potentially will elicit responses that do not address bias or partiality.

17. No objection.

18 – 25. Objection. These questions can be satisfied with the court's standard questions concerning the panel member's ability to remain impartial after the court provides a synopsis or overview of the case. The government objects to the particular inquiry into potential witnesses. This series of questions is repetitive and inflammatory and not designed to elicit potential juror bias.

26. No objection.

27. Objection. This question will be satisfied with the court's synopsis or overview of the case and subsequent questions.

Respectfully submitted,

Jack Smith
Chief

Dana J. Boente
United States Attorney

